

ERIC P. ISRAEL (State Bar No. 132426)
eisrael@DanningGill.com
AARON E. DE LEEST (State Bar No. 216832)
adeleest@DanningGill.com
DANNING, GILL, ISRAEL & KRASNOFF, LLP
1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067-6006
Telephone: (310) 277-0077
Facsimile: (310) 277-5735

Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,
Plaintiff,
vs.

Adv. No. 8:23-ap-01064-SC

**NOTICE OF REQUIRED COMPLIANCE
WITH FRBP 7026 AND LBR 7026-1**

J-SANDCASTLE CO., LLC; J-PAD LLC;
STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
AND E. J. GALLIAN,
Defendants.

Status Conference:
Date: September 26, 2023
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

TO DEFENDANTS:

Plaintiff Jeffrey I. Golden, Chapter 7 Trustee (the "Plaintiff"), hereby gives notice that
compliance with Rule 7026 of the Federal Rules of Bankruptcy Procedure as well as Local
Bankruptcy Rule ("LBR") 7026-1 is required.

///

///

1 A copy of LBR 7026-1 is attached hereto as Exhibit "A."

2
3 DATED: July 6, 2023

DANNING, GILL, ISRAEL & KRASNOFF, LLP

4
5 By: /s/ Aaron E. de Leest

6 AARON E. DE LEEST

7 Attorneys for Plaintiff Jeffrey I. Golden,
8 Chapter 7 Trustee
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

(a) **General.** Compliance with FRBP 7026 and this rule is required in all adversary proceedings.

- (1) **Notice.** The plaintiff must serve with the summons and complaint a notice that compliance with FRBP 7026 and this rule is required.
- (2) **Proof of Service.** The plaintiff must file a proof of service of this notice together with the proof of service of the summons and complaint.

(b) **Discovery Conference and Disclosures.**

- (1) **Conference of Parties.** Unless all defendants default, the parties must conduct the meeting and exchange the information required by FRBP 7026 within the time limits set forth therein. Unless otherwise ordered, the initial status conference constitutes the “scheduling conference” referred to in FRCP 26(f)(1) (incorporated by FRBP 7026).
- (2) **Joint Status Report.** Within 7 days after such meeting, the parties must prepare a joint status report containing the information set forth in LBR 7016-1(a)(2). The joint status report will serve as the written report of the meeting required by FRBP 7026.

(c) **Failure to Make Disclosures or Cooperate in Discovery.**

- (1) **General.** Unless excused from complying with this rule by order of the court for good cause shown, a party must seek to resolve any dispute arising under FRBP 7026-7037 or FRBP 2004 in accordance with this rule.
- (2) **Meeting of Parties.** Prior to the filing of any motion relating to discovery, the parties must meet in person or by telephone in a good faith effort to resolve a discovery dispute. It is the responsibility of the moving party to arrange the conference. Unless altered by agreement of the parties or by order of the court for cause shown, the opposing party must meet with the moving party within 7 days of service upon the opposing party of a letter requesting such meeting and specifying the terms of the discovery order to be sought.
- (3) **Moving Papers.** If the parties are unable to resolve the dispute, the party seeking discovery must file and serve a notice of motion together with a written stipulation by the parties.
 - (A) The stipulation must be contained in 1 document and must identify, separately and with particularity, each disputed issue that remains to be determined at the hearing and the contentions and points and authorities of each party as to each issue.
 - (B) The stipulation must not simply refer the court to the document containing the discovery request forming the basis of the dispute. For example, if the sufficiency of an answer to an interrogatory is in issue, the stipulation must contain, verbatim, both the interrogatory and the allegedly insufficient answer, followed by each party’s contentions, separately stated.
 - (C) In the absence of such stipulation or a declaration of a party of noncooperation by the opposing party, the court will not consider the discovery motion.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF REQUIRED COMPLIANCE WITH FRBP 7026 AND LBR 7026-1 will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) July 6, 2023 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL: On July 6, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by causing to be placed a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 6, 2023

Date

Beverly Lew

Printed Name

/s/ Beverly Lew

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden
adeleest@DanningGill.com, danninggill@gmail.com;adeleest@ecf.inforuptcy.com

Robert P Goe on behalf of Interested Party The Huntington Beach Gables Homeowners
Association
kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com

Jeffrey I Golden (TR)
lwerner@go2.law, jig@trustesolutions.net;kadele@go2.law;C205@ecfcbis.com

United States Trustee (SA)
ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-Sandcastle Co., LLC
Jamie Lynn Galian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

J-Pad LLC
Jamie Lynn Galian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

Steven Galian
2633 Luminous Lane
Costa Mesa, CA 92626

Brian Galian
924 Junipero Drive
Costa Mesa, CA 92626

Justin Barclay
2407 N Driftwood Avenue
Rialto, CA 92377

Ronald J. Pierpont
4519 Ponderosa Way
Yorba Linda, CA 92886

Robert J. McLelland
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

E. J. Galian and Brian Galian
924 Junipero Drive
Costa Mesa, CA 92626

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court
411 W. Fourth Street, Suite 5130
Santa Ana, CA 92701